

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Donald Jacob Burrs, Jr.
a/k/a Donald Jacob Burrs

Debtor 1

Joyce Melinda Burrs

Debtor 2

M&T Bank

Movant(s)

v.

Donald Jacob Burrs, Jr.
a/k/a Donald Jacob Burrs
Joyce Melinda Burrs

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:20-BK-01169-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 46

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Donald Jacob Burrs, Jr. and Joyce Melinda Burrs, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted in part, denied in part. It is admitted that Movant(s) are the holder of a mortgage in the original principal amount of \$25,000.00 which was executed on May 23, 2015. Debtor(s) are without sufficient know as to whether or not the mortgage has been assigned; therefore, it is denied.

5. Admitted.

6. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

7. Upon information and belief, the averment as stated in Paragraph 7 is admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

8. Paragraph 8 contains a conclusion of law to which no response is required.

9. Admitted.

10. Denied in part. Debtor(s) are without sufficient knowledge as to the truth of the averments as stated in Paragraph 10 regarding incurred legal fees and/or costs; therefore, it is denied. The remaining averments as stated in Paragraph 10 contain a conclusion of law to which no response is required.

11. Paragraph 11 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: April 12, 2022

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, April 12, 2022, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

Motion for Relief from the Automatic Stay in this proceeding via electronic means upon the following:

Rebecca Solarz, Esquire
KML Law Group, PC
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
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Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire